

THE NATIONAL ASSOCIATION OF STATE DIRECTORS OF PUPIL TRANSPORTATION SERVICES

December 5, 2002

Docket Management  
Room PL-401  
400 Seventh Street, SW  
Washington, DC 20590

Re: Docket No. NHTSA-2002-12065

The National Association of State Directors of Pupil Transportation Services was founded in 1968, and represents a cross section of individuals and organizations involved in the safe transportation of school children. As the association's name indicates, individuals with the primary responsibility for school transportation in each state are members. In addition, school bus manufacturers, many equipment suppliers to the school bus industry or the school bus aftermarket, school transportation contractors, and a number of state associations whose members include school transportation officials, drivers, trainers, and mechanics also are members of affiliated councils within the association. Based on this diversity in membership, we believe that the State Directors Association provides a unique perspective on pupil transportation issues and speaks for a large segment of the "pupil transportation industry."

The State Directors Association commends the National Highway Traffic Safety Administration for addressing a safety issue that existed in transporting preschool and special needs children in school buses through the issuance of an Interim Final Rule. This action allows for an immediate resolution of the situation. It provides assurance to the pupil transportation industry that safety vests which are attached to school bus seat backs provide a viable means for safely transporting certain children in school buses.

We have reviewed the regulatory language in the Interim Final Rule and concur with it as written. We encourage the agency to make the Interim Final Rule a Final Rule as soon as possible, but certainly before December 1, 2003.

116 Howe Drive, Dover, DE 19901      1-800-585-0340

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In reviewing the regulatory language, we found the following typographical error:

Table to S5.1.3.1(A) - Add-On Forward Facing Child Restraints

There appears to be a typographical error in the second row, fourth column. The text in that box includes the word "it" rather than "if." The text should read, "Attached with lap belt; in addition, if a tether is provided, it is attached."

Thank you for the opportunity to comment on this important rulemaking action.

Sincerely,

Deborah Lincoln  
President